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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA

12 MOHAMMAD SUBHANI,

Case No.: 3:12-cv-01755-MEJ

13 Plaintiff,

**STIPULATION TO CONTINUE  
DEFENDANT'S DEADLINE TO  
RESPOND TO COMPLAINT**

14 vs.

15 WELLS FARGO BANK, NATIONAL  
ASSOCIATION an FDIC insured corporation  
16 and does 1 through 100, inclusive,

Complaint Date: March 8, 2012

17 Defendant.

18  
19 WHEREAS, on March 8, 2012, plaintiff Mohammad Subhani ("Plaintiff") filed an initial  
20 complaint ("Complaint") in the Superior Court of the State of California, for the County of Contra  
21 Costa, Case No. C 12-00551 ("Action");

22 WHEREAS, on March 8, 2012, Plaintiff served the Complaint upon defendant Wells Fargo  
23 Bank, N.A. ("Wells Fargo");

24 WHEREAS, on April 9, 2012, Wells Fargo removed the Action to this Court;

25 WHEREAS, under the Federal Rules of Civil Procedure, Wells Fargo's initial deadline to  
26 answer or otherwise respond to the Complaint was April 16, 2012;

1 WHEREAS, Plaintiff agreed to extend the deadline for Wells Fargo to respond to the  
2 Complaint until April 30, 2012;

3 WHEREAS, the parties have engaged in settlement discussions, which are ongoing;

4 WHEREAS, to facilitate the parties' settlement discussions, Plaintiff has agreed to extend  
5 the deadline for Wells Fargo to respond to the Complaint by another 14 days; and

6 NOW THEREFORE, IT IS HEREBY STIPULATED by the parties hereto, through their  
7 respective counsel, that:

8 1. The time for Wells Fargo to answer or otherwise respond to the Complaint shall be  
9 extended until and including May 14, 2012; and

10 2. This stipulation is without prejudice to the rights, claims, arguments and defenses  
11 of all parties.

12 DATED: April 25, 2012

SAGARIA LAW, P.C.

13 By: /s/ Elliott W. Gale  
14 Elliot W. Gale

15 Attorneys for Plaintiff  
16 Mohammad Subhani

17 DATED: April 25, 2012

SEVERSON & WERSON  
18 A Professional Corporation

19 By: /s/ Alisa A. Givental  
20 Alisa A. Givental

21 Attorneys for Defendant  
22 Wells Fargo Bank, N.A.

23 Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest  
24 under penalty of perjury that concurrence in the filing of the document has been obtained from  
25 Elliott W. Gale.

26 /s/ Alisa A. Givental  
27 Alisa A. Givental

1 **[PROPOSED] ORDER**

2 Pursuant to the stipulation of the parties and GOOD CAUSE APPEARING:

3 IT IS HEREBY ORDERED that the time for Wells Fargo to answer or otherwise respond  
4 to the Complaint shall be extended until and including May 14, 2012.

5 DATED: April 27, 2012

6 CHIEF MAGISTRATE JUDGE  
7 MARIA-ELENA JAMES



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